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9 UNITED STATES BANKRUPTCY COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 **In re:**

14 **PG&E CORPORATION,**

15 **- and -**

16 **PACIFIC GAS AND ELECTRIC**
17 **COMPANY,**

18 Debtors.

- 19 ☐ Affects PG&E Corporation
20 ☐ Affects Pacific Gas and Electric Company
21 ☒ Affects both Debtors

22 ** All papers shall be filed in the Lead Case, No.*
23 *19-30088 (DM).*
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Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF JAMES LEONARD IN
SUPPORT OF REORGANIZED DEBTORS'
OBJECTION TO CLAIM (CLAIM NO.
58462, FILED OCTOBER 17, 2019, OF
SPIRO JANNINGS)**

Response Deadline:

October 26, 2021, 4:00 p.m. (PT)

**Hearing Information If Timely Response
Made:**

Date: November 9, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, James Leonard, hereby declare and state:

2 1. I am an Investigator, Expert in the Corporate Security Department of Pacific Gas and
3 Electric Company, a position I have held for ten years. I have personal knowledge of the facts set
4 forth herein and, if called as a witness, could and would competently testify thereto.

5 2. On July 23, 2015, I began an investigation concerning an allegation of disrespectful
6 conduct and a threat of sexual assault made by Fieldperson Spiro Jannings toward his supervisor,
7 who I shall call "Jane Doe" in this declaration out of respect for her privacy and protection.

8 3. In the course of the investigation, I interviewed six witnesses, including Jane Doe and
9 Mr. Jannings. The investigation substantiated the allegation and determined Mr. Jannings' actions
10 violated the Employee Code of Conduct. Together with my Corporate Security team, I drafted a
11 summary of investigative findings documenting the course of the investigation and our conclusions,
12 a true and correct copy of which is attached hereto as Exhibit A. Exhibit A has been redacted to
13 remove Jane Doe's name.

14 4. My investigation yielded the below evidence and conclusions:

- 15 • Mr. Jannings had previously used inappropriate language regarding Ms.
16 Doe, such as calling her a bitch and yelling obscenities at her;
- 17 • Mr. Pierce, who hardly knew Mr. Jannings, had no reason to lie and,
18 further, told Ms. Doe about the threat because he genuinely feared for
19 her safety;
- 20 • Other employees observed Mr. Jannings speaking with Mr. Pierce and
21 Mr. Jannings made a statement "They are treating you surveyors like
22 shit" and recalled that Mr. Jannings was "an angry guy" who had been
23 "upset and aggressive" in previous encounters with them; and,
- 24 • Ms. Doe also feared for her own safety and accordingly filed a police
25 report to document the incident.

26 I declare under penalty of perjury under the laws of the United States of America and
27 California that the foregoing is true and correct.

28 Executed at WALNUT CREEK, California, this 5 day of October, 2021.



James Leonard